

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SHIRLEY CRAWFORD, MATTHEW
JORDAN, MELISSA ALEJANDRO,
NICOLA SOBERS, JANICE BUTLER,
PAULINE DION, LISA SAGHY, and
RICHARD ANGEMI, individually and
on behalf of all those similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS
AMERICA, INC., and SAMSUNG
ELECTRONICS CO., LTD.,

Defendants.

Civil Action No. 2:22-cv-02828-
MCA-AME

**STIPULATION AND
[PROPOSED] ORDER TO
VACATE PENDING
DEADLINES**

Plaintiffs Shirley Crawford, Matthew Jordan, Melissa Alejandro, Nicola Sobers, Janice Butler, Pauline Dion, Lisa Saghy, and Richard Angemi (collectively, “Plaintiffs”) and Defendants Samsung Electronics America, Inc. (“SEA”) and Samsung Electronics Co., Ltd. (“SEC” and together with SEA, “Defendants”), by counsel, stipulate as follows:

WHEREAS, Plaintiffs and Defendants recently attended private mediation;

WHEREAS, following the successful mediation, the parties are in the process of concluding this matter;

WHEREAS, the parties presently anticipate filing a joint stipulation for dismissal of this action in the next 30 days;

WHEREAS, to preserve party and Court resources pending dismissal, the parties wish to vacate all upcoming dates in this matter, including (i) any deadlines for Plaintiffs or Defendants to file pleadings, (ii) any deadlines for discovery or discovery status reports; and (iii) the Status Conference presently scheduled for June 28, 2024, at 10:00 a.m. (Dkt. 68);

WHEREAS, in the unexpected event that this action is not dismissed in the next 30 days, the parties propose setting a deadline to submit a joint status report by July 10, 2024, which deadline will be obviated by the anticipated dismissal;

WHEREAS, there is good cause to grant this Stipulation because it will preserve litigant resources and promote judicial economy;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, and subject to approval by the Court, that:

1. All upcoming deadlines in this matter are vacated, including any deadlines for Plaintiffs or Defendants to file pleadings, or any deadlines for discovery or discovery status reports;
2. The Status Conference presently scheduled for June 28, 2024, at 10:00 a.m. (Dkt. 68) is vacated;
3. If for any unforeseen reason this action is not dismissed in its entirety by July 10, 2024, the parties shall file a joint status report by that date.

IT IS SO STIPULATED, through Counsel of Record.

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

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Attorneys for Plaintiffs

By: /s/ Jason L. Lichtman
Jason L. Lichtman

Date: June 12, 2024

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Attorneys for Defendants

By: /s/ Liza M. Walsh
Liza M. Walsh

Date: June 12, 2024

SO ORDERED this _____ day of June 2024

ANDRÉ M. ESPINOSA
United States Magistrate Judge